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January 29, 2010

Via Electronic Case Filing

Honorable Lois Bloom
United States Magistrate Judge
United States District Court
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Jeter v. New York City Department of Education, et al.
Docket No: 06 Civ. 3687 (DGT)(LB)

Dear Magistrate Judge Bloom:

I am an Assistant Corporation Counsel in the office of Michael A. Cardozo, Corporation Counsel of the City of New York, attorney for defendants in the above referenced action. This letter is submitted in response to plaintiff's letter, dated January 28, 2010, seeking "an additional 30 day extension of discovery until March 1, 2010, to complete depositions and obtain additional discovery." Although plaintiff submitted the application without first consulting defendants in contravention of Your Honor's Individual Rules, defendants do not oppose the request to extend discovery for the purposes of competing depositions, but oppose the request to "obtain additional discovery."

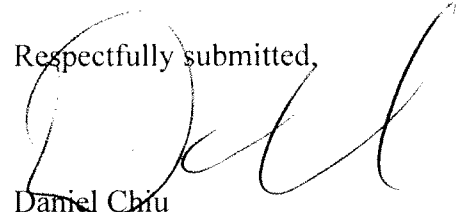
In accordance with the Court's November 13, 2009 Order, discovery for all purposes was previously extended to and scheduled to close on December 31, 2009. In an Order, dated December 17, 2009, the Court modified the discovery schedule, extending discovery "to January 29, 2010 for the limited purpose of completing the necessary depositions." See December 17, 2009 Order at 3. Discovery for all other purposes thus closed on December 31, 2009.

Defendants therefore do not oppose plaintiff's request to extend discovery for the limited purpose of completing depositions, but oppose plaintiff's belated application to extend discovery in order to "obtain additional discovery."

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Thank you for your consideration of this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'D. Chiu', is written over a faint circular stamp.

Daniel Chiu
Assistant Corporation Counsel

cc: Bryan Glass, Esq. (via ECF)